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12	ANASTASIA MARTINEZ		
13			
14	UNITED STATES I	DISTRICT COURT	
15	CENTRAL DISTRIC		
16			565 (15) 6
17	ANASTASIA MARTINEZ,	Case No.: _22-cv-06589	DSF (AFM)
18	Plaintiff,	[Assigned to the Honora Fischer–Courtroom 7D]	ble Dale S.
19	v.	DI AINTOIDESC AMENI	
20	COUNTY OF LOS ANGELES, DANNY BANUELOS, ALEX VILLANUEVA, CALIFORNIA COMMERCE CLUB, INC. and DOES 1 through 10.	PLAINTIFF'S AMENI LIST	DED WIINESS
21	CALIFORNIA COMMERCE CLUB,	Pratrial Conference	
2223	Defendants.	Pretrial Conference: Date: April 1, 202 Time: 3:00 p.m. Courtroom: 7D	24
24			October 4, 2022
25		Complaint Filed: Discovery Cut-Off: Motion Cut-Off: Trial:	October 4, 2022 Dec. 15, 2023 Jan. 22, 2024 April 30, 2024
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Plaintiff submits her Amended Initial Trial Witness List, pursuant to the requirements of Fed. R. Civ. Proc. 26(a)(3)(A), Local Rule 16-5, and Judge Fischer's Order re: Jury Trial.

Plaintiff reserves her right to add, delete, or otherwise amend the witness list as she continues her preparations for trial.

6	Witness	Brief Description of Testimony	Time Est.
7	Aguilar, Rosario	Rosario Aguilar is a sexual assault	Direct: 30
8		nurse at the LA/USC Medical Center	mins.
		who conducted the Sexual Assault	
9		Response Team exam of Plaintiff	Cross:
10		following the sexual assault by	
11		Defendant Banuelos. Defendants have	Redirect:
11		designated Ms. Aguilar as a non-	10 mins.
12		retained expert. Ms. Aguilar will	
13		testify regarding the findings of the	
		examination.	D: 00
14	Burson, Matthew	Matthew Burson served as the	Direct: 20
15		Division Chief of the Los Angeles	mins.
		Sheriff's Department Internal	Carana
16		Criminal Affairs Bureau at the time of	Cross:
17		the incident. Burson will testify	Redirect: 5
1.0		regarding the Los Angeles Sheriff's Department response to incidents of	mins.
18		violence and deputy gangs occurring	1111115.
19		the in the East Los Angeles Sheriff's	
20		station, including breakdown in	
		LASD's command structure and	
21		LASD's attempt to cover up deputy	
22		misconduct.	
	Clark, Roger	Roger Clark is Plaintiff's police	Direct: 1.5
23		practices expert. Mr. Clark will testify	hrs.
24		as to his expert opinions regarding the	
25		actions taken by Defendant Banuelos	Cross:
23		prior to and during the sexual assault	
26		of Plaintiff and regarding the	Redirect:
27		practices, procedures, policies, and	45 mins.
		culture of Defendant County of Los	
28		Angeles' East Los Angeles Sheriff's	

1	Witness	Brief Description of Testimony	Time Est.
		Station as related to the sexual assault.	
2	Contreras, Mario	Mario Contreras is a deputy with the	Direct: 20
3		Los Angeles Sheriff's Department	mins.
4		who worked at the East Los Angeles	
		station. Contreras will testify	Cross:
5		regarding the influence of the Banditos in the East Los Angeles	Redirect: 5
6		station, including the violence,	mins.
7		intimidation, and harassment that	IIIIII5.
,		deputies form the East Los Angeles	
8		station often engaged in.	
9	Granados, Louis	Louis Granados is a deputy with the	Direct: 20
10		Los Angeles Sheriff's Department	mins.
10		who previously worked at the East Los	
11		Angeles station. Granados will testify	Cross:
12		regarding the culture and practices of	D 1:
		the East Los Angeles station, which	Redirect: 5
13		were heavily influenced by the	mins.
14		Banditos, including violence, illegal activity, and harassment. Granados	
15		will also testify regarding Defendant	
		County of Los Angeles' knowledge of	
16		these practices and culture and failure	
17		to intervene.	
18	Gonzalez, Alfred	Alfred Gonzalez is a deputy with the	Direct: 30
		Los Angeles Sheriff's Department	mins.
19		who previously worked at the East Los	
20		Angeles station. He will testify	Cross:
		regarding his experience with the	Dadinast.
21		culture of the East Los Angeles station, including the culture lead by	Redirect: 10 mins.
22		the Banditos of intimidation, violence,	10 mms.
23		and harassment.	
	Gonzalez, Rosa	Rosa Gonzales is a sergeant with the	Direct: 20
24	Í	Los Angeles Sheriff's Department.	mins.
25		Gonzalez will testify regarding her	
26		experience of being discriminated	Cross:
		against on the basis of gender when	
27		she worked at the East Los Angeles	Redirect: 5
28		station and the misogynistic culture	mins.

1	Witness	Brief Description of Testimony	Time Est.
2		perpetuated by the Banditos at the East	
2		Los Angeles station.	
3	Hanamaikai, Nikki	Nikki Hanamaikai is a sergeant with	Direct: 45
4		the Los Angeles Sheriff's Department	mins.
		and was the preliminary investigator	Casas
5		into the sexual assault of Plaintiff by	Cross:
6		Defendant Banuelos. Sgt. Hanamaikai will testify regarding the investigation	Redirect:
7		into the subject incident conducted by	15 mins.
,		Defendant County of Los Angeles	15 mms.
8		immediately following the incident,	
9		including his contact with Plaintiff	
		immediately following the incident.	
10	Harper, Daniel	Daniel Harper is a supervising security	Direct: 30
11		officer with the Commerce Hotel and	mins.
12		Casino. Mr. Harper will testify	
		regarding his observations of Plaintiff	Cross:
13		prior to the sexual assault, including	D 11
14		his observation that Plaintiff appeared	Redirect:
		to be intoxicated. Mr. Harper will also	10 mins.
15		testify regarding his contact with Defendant Banuelos immediately prior	
16		to Defendant Banuelos sexually	
17		assaulting Plaintiff, where Defendant	
		Banuelos contacted Mr. Harper and	
18		told him that Plaintiff requested	
19		information regarding a restraining	
20		order. Mr. Harper offered to	
		accompany Defendant Banuelos to	
21		Plaintiff's hotel room, but Defendant	
22		Banuelos refused and went to	
22	Hantsman Mar	Plaintiff's hotel room alone.	Dinasti 20
23	Huntsman, Max	Max Huntsman is the Inspector General of the County of Los Angeles.	Direct: 30 mins.
24		Huntsman will testify regarding the	IIIIIIS.
25		culture of the East Los Angeles	Cross:
		Sheriff's station and LASD's refusal	
26		to take steps to correct the culture and	Redirect:
27		obstruction of outside investigation to	10 mins.
28		the issue of deputy gangs or cliques	
20		and incidents of violence at the	
		_	

1	Witness	Brief Description of Testimony	Time Est.
		station.	
2	Jara, Liliana	Liliana Jara is a sergeant with the Los	Direct: 45
3		Angeles Sheriff's Department and led	mins.
4		the Internal Criminal Investigations	C
		Bureau Professional Standards Division investigation into the sexual	Cross:
5		assault of Plaintiff by Defendant	Redirect:
6		Banuelos and authored the 1,600+	15 mins.
7		page report regarding the	13 1111113.
,		investigation. Sgt. Jara will testify	
8		regarding the investigation, the	
9		findings of the investigation,	
10		Defendant County of Los Angeles'	
10		response in regard to Defendant	
11		Banuelos following the investigation,	
12		and Defendant County of Los	
		Angeles' refusal to provide Plaintiff	
13	Vannaday Caan	with the name of Defendant Banuelos.	Direct: 30
14	Kennedy, Sean	Sean Kennedy is the Commission Chair of the Civilian Oversight	mins.
15		Commission. Kennedy will testify	1111115.
		regarding the culture created by the	Cross:
16		Banditos deputy gang in the East Los	
17		Angeles station. The Banditos coerce	Redirect:
18		female trainees into having sex with	10 mins.
		them and retaliate against those who	
19		do not and often engage in acts of	
20	T 1' ' X7' ' '	violence.	D: 4.20
	Ladjevic, Virginia	Virginia Ladjevic is a sergeant with	Direct: 30
21		the Los Angeles Sheriff's Department and is one of Defendant County of Los	mins.
22		Angeles' rule 30(b)(6) designees. Sgt.	Cross:
23		Ladjevic will testify regarding	C1055.
		Defendant County of Los Angeles'	Redirect:
24		process for investigating and resolving	10 mins.
25		complaints of sexual harassment.	
26	Lemus, Ariela	Ariela Lemus was a deputy with the	
		Los Angeles Sheriff's Department	
27		who previously worked out of the East	
28		Los Angeles station. Lemus will	

1	Witness	Brief Description of Testimony	Time Est.
2		testify regarding the culture and	
		practices of the East Los Angeles	
3		station, which are heavily influenced	
4		by the Banditos. This includes	
		deputies engaging in acts of violence,	
5	Levine, David	intimidation, and dishonesty. David Levine was a security officer	Direct: 30
6	Leville, David	with the Commerce Hotel and Casino	mins.
7		at the time of the subject incident. Mr.	1111115.
7		Levine will testify that immediately	Cross:
8		prior to Defendant Banuelos' sexual	C1033.
9		assault of Plaintiff, he offered three	Redirect:
		times to Defendant Banuelos to bring	10 mins.
10		Plaintiff down from her room to speak	
11		with him but Defendant Banuelos	
		refused and proceeded to Plaintiff's	
12		hotel room alone. Mr. Levine will also	
13		testify regarding his observations of	
14		Plaintiff immediately prior to the	
		sexual assault, including that Plaintiff	
15		was noticeably intoxicated.	
16	Lujan, Eileen	Eileen Lujan is a sexual assault nurse	Direct: 30
		at the LA/USC Medical Center who	mins.
17		conducted the Sexual Assault	
18		Response Team exam of Plaintiff	Cross:
19		following the sexual assault by Defendant Banuelos. Defendants have	Redirect:
19		designated Ms. Lujan as a non-	10 mins.
20		retained expert. Ms. Lujan will testify	10 mms.
21		regarding the findings of the	
		examination.	
22	Magana, Jaime	Jaime Magana is a sergeant with the	Direct: 30
23		Los Angeles Sheriff's Department and	mins.
24		is one of Defendant County of Los	
		Angeles' rule 30(b)(6) designees. Sgt.	Cross:
25		Magana will testify regarding training	
26		regarding sexual harassment, honesty,	Redirect:
		courtesy, and self-identification	10 mins.
27		provided to Defendant Banuelos by	
28		Defendant County of Los Angeles.	

1	Witness	Brief Description of Testimony	Time Est.
	Martinez, Anastasia (Plaintiff)	Plaintiff will testify about the sexual	Direct: 2
2		assault by Defendant Banuelos,	hrs.
3		including her alcohol consumption	C
4		prior to the incident, her interactions with Defendant Banuelos when he	Cross:
5		responded to her 911 call, Defendant	Redirect: 1
3		Banuelos' communications with her,	hr.
6		the subject incident, and her actions	
7		after the incident.	
8		Plaintiff will also testify about her	
9		damages resulting from the sexual	
		assault by Defendant Banuelos,	
10		including the psychological and	
11		emotional distress she has suffered as	
12		a result of the sexual assault and the	
13		impact that the sexual assault has had on her life and functioning.	
	Martinez, Julie	Julie Martinez is Plaintiff Anastasia	Direct: 45
14		Martinez's mother. Ms. Martinez will	mins.
15		testify regarding reporting Defendant	
16		Banuelos' sexual assault of Plaintiff to	Cross:
17		Defendant County of Los Angeles.	Redirect:
		Ms. Martinez will also testify about	15 mins.
18		Plaintiff's damages, including the	
19		emotional distress Plaintiff suffered	
20		immediately following the sexual assault and the long-term	
21		psychological impact she has	
22		witnessed Plaintiff experience as a	
		result of the sexual assault. Ms.	
23		Martinez will testify regarding	
24		Plaintiff's damages from a different perspective than Plaintiff. As her	
25		mother, Ms. Martinez has known	
26		Plaintiff her entire life and therefore is	
		well positioned to testify about the	
27		changes she has witnessed in Plaintiff	
28	Mechanic, Mindy	as a result of the sexual assault. Dr. Mindy Mechanic is Plaintiff's	Direct: 45
	ivicename, ivimuy	DI. Mility Micenaille is I failfull 8	DIICCI. 73

1	Witness	Brief Description of Testimony	Time Est.
2		rebuttal forensic psychology expert. In	mins.
		the event that Defendants' forensic psychology expert Dr. Adrienne Meier	Cross:
3		testifies, Dr. Mechanic will rebut Dr.	Closs.
4		Meier's testimony by testifying about	Redirect:
5		the methodology Dr. Meier used to	15 mins.
		develop her opinions.	
6	Mejia, Ricardo	Ricardo Mejia is a friend of Plaintiff	Direct: 30
7		who spoke with Plaintiff on the phone	mins.
8		immediately prior to Defendant	
		Banuelos' sexual assault of Plaintiff.	Cross:
9		Mr. Mejia will testify regarding Plaintiff's reaction to Defendant	Redirect:
10		Banuelos contacting her and Plaintiff's	10 mins.
11		state of mind prior to the sexual	
		assault.	
12	Olmos, Luis	Luis Olmos is a senior criminalist with	Direct: 20
13		the Los Angeles County Sheriff's	mins.
14		Department. Defendants have	
		designated Mr. Olmos as a non-	Cross:
15		retained expert. Mr. Olmos will testify regarding the DNA evidence analysis	Redirect: 5
16		he conducted of DNA evidence	mins.
17		collected from the scene of Defendant	iiiiis.
		Banuelos' sexual assault of Plaintiff.	
18	Omstead, Robert	Robert Olmstead was the Assistant	Direct: 20
19		Sheriff with the Los Angeles Sheriff's	mins.
20		Department at the time of the incident.	
		Olmstead will testify regarding	Cross:
21		LASD's knowledge of the existence of	Redirect: 5
22		the Banditos deputy gang in the East Los Angeles station and LASD's lack	mins.
23		of intervention or investigation into	iiiiis.
		the impact of the Banditos in the East	
24		Los Angeles station.	
25	Rivas, Mike	Mike Rivas was a detective with the	Direct: 15
26		Los Angeles Sheriff's Department's	mins.
		high tech task force. Defendants have	
27		designated Mr. Rivas as a non-retained	Cross:
28		expert. Mr. Rivas will testify	

1	Witness	Brief Description of Testimony	Time Est.
2		regarding the forensic examination he	Redirect: 5
2		conducted of Defendant Banuelos'	mins.
3		two cell phones including the data he	
4		extracted from the phones regarding	
		Defendant Banuelos' communications	
5		and attempts to communicate with	
6		Plaintiff and Defendant Banuelos'	
	Sandhara Miahalla	post-assault activity.	Direct: 10
7	Sandberg, Michelle	Michelle Sandberg is a senior criminalist with the Los Angeles	mins.
8		County Sheriff's Department.	IIIIIIS.
0		Defendants have designated Ms.	Cross:
9		Sandberg as a non-retained expert.	Closs.
10		Ms. Sandberg will testify regarding	
11		the results of the laboratory drug tests	
		she conducted on Plaintiff following	
12		the sexual assault by Defendant	
13		Banuelos.	
	Neal, Somavedey	Somavadey Neal is a senior	Direct: 10
14	,	criminalist with the Los Angeles	mins.
15		County Sheriff's Department.	
16		Defendants have designated Ms.	Cross:
10		Somavedey as a non-retained expert.	
17		Ms. Somavedey will testify regarding	
18		the results of the laboratory tests	
		regarding Plaintiff's Blood Alcohol	
19		Concentration she conducted on	
20		Plaintiff following the sexual assault	
21	Tander Ameil	by Defendant Banuelos.	Dinasti 20
21	Tardy, April	April Tardy was the Chief of the Los Angeles Sheriff's Department's	Direct: 30 mins.
22		Central Patrol Division at the time of	1111115.
23		the subject incident. Ms. Tardy will	Cross:
		testify regarding her request for an	C1033.
24		investigation into the sexual assault of	Redirect:
25		Plaintiff by Defendant Banuelos and	10 mins.
		the Defendant County of Los Angeles'	_
26		investigation into and response to the	
27		sexual assault.	
28	Zaredini, Benjamin	Banjamin Zaredini is a deputy with the	Direct: 20

1	Witness	Brief Description of Testimony	Time Est.
		Los Angeles Sheriff's Department.	mins.
2		Zaredini will testify regarding the	
3		culture and practices of the East Los	Cross:
		Angeles Sheriff's station, including	
4		the LASD's knowledge of the	Redirect: 5
5		Banditos, misconduct occurring at the	mins.
		East Los Angeles station, and	
6		breakdown in the command structure	
7		and discipline.	
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Dated: March 14, 2024

Respectfully Submitted,

HADSELL STORMER RENICK & DAI LLP

By: /s/ Rebecca Brown
Dan Stormer
Hanna Chandoo
Rebecca Brown
Attorneys for Plaintiff
ANASTASIA MARTINEZ